The National Center for Law and Deafness



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FOR MAIL BRANCH FCC MAIL BRANCH

Ms. Donna Searcy Secretary Federal Communications Commission 1919 M Street, N.W. Room 222 Washington, D.C. 20554

Re: CC Docket 92-105

Notice of Ex Parte Presentation

Dear Secretary Searcy:

On August 17, 1992, I sent the enclosed letter, requesting assignment of Nll service codes on a national basis for access to telecommunications relay services, to Mr. George Via of Bell Communications Research. Copies of this letter were sent to:

FCC Chairman Alfred Sikes Senior Legal Advisor Kenneth Robinson

Commissioner James H. Quello Legal Advisor Robert Corn-Revere

Commissioner Sherrie P. Marshall Legal Advisor Kathleen Abernathy

Commissioner Andrew C. Barrett Special Advisor Madeline Kuchera

Commissioner Ervin S. Duggan Legal Advisor Linda Oliver

Larry Povich, Senior Economist, Industry Analysis Division



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Cheryl Tritt, Chief of Common Carrier Bureau Linda Dubroof, Director, TRS Implementation

Kaun Puts Strauss

Karen Peltz Strauss Supervising Attorney



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92-105 / FOCMAIL BRANCH

Mr. George Via Vice President

FOC MAIL BHAINCH Operations Technology

Bell Communications Research

MRE-1G302

435 South Street

Morristown, New Jersey 07960

Dear Mr. Via:

The purpose of this letter is to request the assignment of Nll service codes on a national basis for access to voice and text telephone relay services.

As you are aware, Congress recently passed the Americans with Disabilities Act (ADA). The purpose of this legislation was to bring an end to discrimination against individuals with disabilities and to bring persons with disabilities into the economic and social mainstream of American life. Included in this legislation was the mandate that the public switched telecommunications network be more accessible to these individuals. Toward this end, common carriers are required to provide both intra- and interstate telecommunications relay services nationwide by July 26, 1993.

Telecommunications relay services enable individuals who use text telephones, also known as telecommunication devices for the deaf (TDDs), to carry on near simultaneous conversations with individuals who use conventional voice telephones over the telephone network. For the most part, individual states have acted independently in establishing their own relay systems. This has resulted in a confusing myriad of seven and ten digit telephone numbers across the nation.

The assignment of one or two N11 numbers (eg. 511 and 711) to provide uniform, nationwide access to telecommunications relay services would eliminate this confusion. It would provide fast,



Mr. George Via August 17, 1992 Page 2

convenient, and uncomplicated access for relay users to the telephone network. Users could access the relay system in the same manner anywhere and would no longer have to learn or remember a variety of telephone numbers. In this manner, allocation of these numbers would benefit the entire calling public and serve as a simple mechanism to bring telephone service to deaf, hard of hearing, and speech impaired individuals.

Although the ADA's relay requirements do not take effect until July 1993, statewide relay services have begun operations in nearly all of the fifty states. Therefore, to facilitate the introduction and use of these valuable services, we need to obtain the national assignment of N11 codes for telecommunications relay services as soon as possible. Accordingly, we would appreciate your response to our request by September 8, 1992.

If you have any questions or require additional information, please do not hesitate to contact me.

Sincerely,

Karen Peltz Strauss Supervising Attorney

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cc: FCC Chairman Alfred Sikes
Senior Legal Advisor Kenneth Robinson

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Commissioner Ervin S. Duggan Legal Advisor Linda Oliver

Larry Povich, Senior Economist, Industry Analysis Division Cheryl Tritt, Chief of Common Carrier Bureau Linda Dubroof, Director, TRS Implementation